

TODD KIM, Assistant Attorney General
 United States Department of Justice
 Environment and Natural Resources Division
 MICHELLE M. SPATZ, Trial Attorney
 FRANCES B. MORRIS, Trial Attorney
 P.O. Box 7611, Ben Franklin Station
 Washington, D.C. 20044-7611
 (202) 598-9741 (Spatz)
 (202) 514-2855 (Morris)
 michelle.spatz@usdoj.gov
 frances.morris@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit
 corporation, LAURA LEIGH, individually, and
 WILD HORSE EDUCATION, a nonprofit
 corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE
 INTERIOR, BUREAU OF LAND
 MANAGEMENT, and JON RABY, Nevada
 State Director of the Bureau of Land
 Management,

Federal Defendants.

Case No. 2:22-cv-01200-CDS-BNW

**JOINT MOTION TO EXTEND THE
 BRIEFING DEADLINES FOR
 PLAINTIFFS' SECOND MOTION
 FOR JUDICIAL NOTICE [ECF NO.
 65]**

Plaintiffs Laura Leigh, Cana Foundation, Wild Horse Education, and Federal
 Defendants the Bureau of Land Management and Jon Raby, in his official capacity as the State
 Director for the Bureau of Land Management in Nevada respectfully request that the Court
 extend the briefing deadlines for Plaintiffs' Second Motion for Judicial Notice, filed on April
 13, 2024, ECF No. 65, to align them with the parties' remaining summary judgment briefing
 deadlines.

Under Local Rule of Civil Practice 7-2(b), Federal Defendants’ response to Plaintiffs’ motion for judicial notice is currently due on April 26, 2024, and Plaintiffs’ reply is due May 3, 2024. *See* LR 7-2(b). Because Plaintiffs’ motion for judicial notice was filed simultaneously with their opposition to Federal Defendants’ cross-motion for summary judgment and reply in support of their motion for summary judgment (ECF No. 63) and is styled as a motion for “JUDICIAL NOTICE IN SUPPORT OF PLAINTIFFS’ OPPOSITION TO DEFENDANTS’ CROSS-MOTION FOR SUMMARY JUDGMENT AND REPLY IN SUPPORT OF PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT[.]” ECF No. 65, the parties believe that it would be most efficient to align the briefing deadlines for Plaintiffs’ second motion for judicial notice (ECF No. 65) with the remaining summary judgment deadlines set forth in the Court’s Order entered on February 20, 2024 (ECF No. 59).

Accordingly, the parties request that the Court extend Federal Defendants’ deadline to respond to Plaintiffs’ second motion for judicial notice to May 10, 2024 (the same day that Federal Defendants’ reply in support of their summary judgment motion is due), and that the Court extend Plaintiffs’ deadline to file their reply in support of their motion for judicial notice to May 24, 2024.

Dated: April 18, 2024

Respectfully Submitted,

TODD KIM, Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

/s/ Jessica L. Blome
Jessica L. Blome
(Cal. Bar No. 314898, admitted pro hac vice)
GREENFIRE LAW, PC

/s/ Michelle M. Spatz
MICHELLE M. SPATZ, Trial Attorney
Wildlife and Marine Resources Section
michelle.spatz@usdoj.gov
(202) 598-9741

2748 Adeline Street, Suite A
Berkeley, CA 94703
(510) 900-9502
jblome@greenfirelaw.com

FRANCES B. MORRIS, Trial Attorney
Natural Resources Section
frances.morris@usdoj.gov

Attorneys for Plaintiffs

1 (202) 514-2855

2 *Attorneys for Federal Defendants*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 18, 2024, I filed the foregoing Joint Motion to Extend the Briefing Deadlines for Plaintiffs' Second Motion for Judicial Notice electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz

Michelle M. Spatz
U.S. Department of Justice